

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE: INTEREST RATE SWAPS  
ANTITRUST LITIGATION

Case No. 16-MD-2704 (JPO)

This Document Pertains To:

Hon. J. Paul Oetken

ALL CLASS ACTION CASES

**NOTICE OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF THE NEW  
SETTLEMENT AGREEMENT**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the Declaration of Daniel L. Brocket and the exhibits attached thereto, and the record herein, Plaintiffs, by and through their undersigned counsel, will respectfully move this Court, before the Honorable J. Paul Oetken, United States District Judge for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, at a date and time to be determined by this Court, for entry of the proposed order preliminarily approving the New Settlement Agreement pursuant to Rule 23 of the Federal Rules of Civil Procedure, certifying the Settlement Class, and appointing Class Counsel and Class Representatives for the Settlement Class. This [Proposed] Preliminary Approval Order has been agreed to by Plaintiffs and the Newly Settling Defendants, and consists of:

- (1) preliminarily approving the settlement set forth in the New Settlement Agreement;
- (2) preliminarily certifying a Settlement Class for purposes of settlement only;
- (3) preliminarily appointing Quinn Emanuel Urquhart & Sullivan, LLP, and Cohen Milstein Sellers & Toll PLLC as Co-Lead Counsel for the Settlement Class;

- (4) preliminarily appointing Plaintiffs as class representatives for the Settlement Class;
- (5) ordering that Plaintiffs shall, at a later practicable date, submit for the Court's approval a proposed Plan of Allocation of the Settlement Amount and a proposed notice plan;
- (6) preliminarily approving Epiq Class Action & Claims Solutions, Inc. as Settlement Administrator, the Huntington National Bank as Escrow Agent, and preliminarily approving certain administrative expenses to be paid as agreed to by the parties in the New Settlement Agreement;
- (7) preliminarily approving the establishment of escrow accounts under the New Settlement Agreement as Qualified Settlement Funds;
- (8) staying all proceedings in the action with respect to the Newly Settling Defendants; and
- (9) granting such other and further relief as the Court deems just and proper.

Dated: June 27, 2024

Respectfully submitted,

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